

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

*David E. Patton*  
Executive Director  
and Attorney-in-Chief

Southern District of New York  
*Jennifer L. Brown*  
Attorney-in-Charge

November 19, 2021

**BY ECF AND EMAIL**

Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 2013  
New York, NY 10007

**MEMO ENDORSED**

**Re: United States v. Souleymane Balde,  
20 Cr. 281 (KPF)**

Dear Judge Failla:

We write to request that the Court remove the curfew and location-monitoring conditions of Mr. Balde's bail release. Mr. Balde remains in full compliance with Pretrial supervision and is presently working as an Uber driver. The primary reason for this bail-modification request is to enable Mr. Balde to work at night. During the day Mr. Balde cannot work many hours because he is responsible for the care of his five-year-old daughter; he wishes to work additional hours at night after his wife gets home from her job. In addition, I understand that Mr. Balde will soon have an MRI for ongoing knee issues that will require removal of his ankle bracelet.

Neither Pretrial Services nor the government has any objection to this request.

Sincerely,

/s/

Clay H. Kaminsky  
Assistant Federal Defender  
(212) 417-8749 / (646) 842-2622

CC: AUSAs Christy Slavik and Kiersten Fletcher  
USPSO Christina Venable

Application GRANTED.

The Clerk of Court is directed to terminate the motion at docket entry 93.

SO ORDERED.

Dated: November 19, 2021  
New York, New York



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE